

### REMARKS

Claims 1, 16, and 17 have been amended. No claims have been canceled or added. Accordingly, after entry of this Amendment, claims 1-17 will remain pending.

In the Office Action dated June 29, 2005, the Examiner rejected claims 1, 7-11, 13, 14, 16, and 17 under 35 U.S.C. § 102(e) as anticipated by Hirota et al. (U.S. Patent No. 6,805,135). Claims 1-16 were rejected under 35 U.S.C. § 102(e) as anticipated by Nishimoto et al. (U.S. Patent No. 6,837,966). The Applicant respectfully disagrees with both rejections and, therefore, respectfully traverses the same.

Claims 1, 7-11, 13, 14, 16, and 17 are patentable over Hirota et al. because the claims recite a baffle plate assembly, a disposable baffle plate, and a method of replacing a baffle plate that involve, among other features, a centering ring with at least a portion of the centering ring extending radially outside a periphery of the substrate holder. None of the references cited by the Examiner include at least this feature. As a result, none of the references may anticipate claims 1-17.

Hirota et al. describes a cleaning fluid and cleaning method for components of a semiconductor-treating apparatus. In discussing the cleaning fluid and method, Hirota et al. describes an etching apparatus 100 that includes a baffle plate 110, a clamp ring 112, and a focus ring 114. (Hirota et al. at col. 5, line 59, through col. 6, line 9.) The baffle plate 110, clamp ring 112, and focus ring 114 are all detachable singly from the process chamber 102 and are interchangeable with new equivalent components. (Hirota et al. at col. 6, lines 32-34.) While these components are indicated as removable, there is not indication within Hirota et al. of a centering ring with at least a portion of the centering ring extending radially outside a periphery of the substrate holder. In addition, contrary to the Examiner's assertion, the Applicant respectfully submits that the focus ring 114 cannot be considered a centering ring since it does not provide any centering function (as far as the Hirota et al. provides), since it does not appear to be connected in any way to the baffle plate 110, and since no portion of the focus ring 114 appears to extend radially outside a periphery of the substrate holder. Accordingly, the Applicant respectfully submits that claims 1-17 are patentable over Hirota et al., because the reference does not describe each and every feature of claims 1-17.

Similarly, Nishimoto et al. also does not describe a centering ring with at least a portion of the centering ring extending radially outside a periphery of the substrate

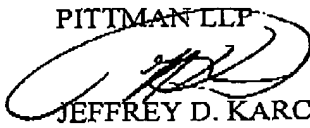
U.S. Non-Provisional Application of FINK et al., atty. dkt. 071469-0305806

holder. Instead, Nishimoto et al. describes a method an apparatus for an improved baffle plate in a plasma processing system. As discussed in the reference, a bellows shield 54 can, for example, be coupled to the substrate holder 30 and configured to protect the bellows 52 from the processing plasma. (Nishimoto et al. at col. 4, lines 61-64.) The baffle plate 64 extends around the periphery of the substrate holder 30. (Nishimoto et al. at col. 4, lines 66-67.) The baffle plate 64 is coupled to the substrate holder 30. (Nishimoto et al. at col. 6, line 38.) Nowhere, however, does Nishimoto et al. describe, among other features, a centering ring with at least a portion of the centering ring extending radially outside a periphery of the substrate holder. Accordingly, Nishimoto et al. fails to describe each and every feature of claims 1-17 and, therefore, cannot anticipate those claims.

Each of the rejections having been addressed, the Applicant respectfully requests that the Examiner reconsider the rejection of the claims and withdraw the asserted rejections.

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Respectfully submitted,  
PILLSBURY WINTHROP SHAW  
PITTMAN LLP



JEFFREY D. KARCESKI  
Reg. No. 35914  
Tel. No. 703 770.7510  
Fax No. 703.770.7901

Date: December 21, 2005  
P.O. Box 10500  
McLean, VA 22102  
(703) 770.7900